

CERTIFICATE OF COMPLIANCE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: February 15, 2011
2. Name of municipality covered by this certification: City of Elberton, Georgia d/b/a Elberton Utilities
3. Form 499 Filer ID: 827067
4. Name of signatory: Lanier Dunn
5. Title of signatory: City Manager
6. Certification:

I, Lanier Dunn, certify that I am an officer of the City of Elberton, Georgia, a municipality doing business as Elberton Utilities ("Elberton Utilities") and, acting as an agent of the city, that I have personal knowledge that Elberton Utilities has established operating procedures, summarized in the attached statement, that are adequate to ensure compliance with the Federal Communications Commission's customer proprietary network information ("CPNI") rules as set forth in Part 64, Subpart U of the Commission's rules, 47 C.F.R. §§ 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how Elberton Utilities' procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

Elberton Utilities has not received any customer complaints in the past calendar year concerning unauthorized release of CPNI. Elberton Utilities does not have any material information with respect to the processes pretexters are using to attempt to access CPNI that is not already a part of the record in the Commission's CC Docket No. 96-115. Elberton Utilities has therefore not taken any actions in the past year against data brokers, including proceedings instituted or petitions filed by Elberton Utilities at either the Georgia Public Service Commission, any court, or at the Commission. Elberton Utilities has established procedures to report any breaches to the FBI and United States Secret Service, and it has emphasized in its employee training the need for vigilance in identifying and reporting unusual activity in order to enable Elberton Utilities to continue to take reasonable measures to discover and protect against pretexting and other unauthorized access to CPNI.

I hereby represent and warrant that the above certification is consistent with Section 1.17 of the Commission's rules, 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject a filer to enforcement actions.



Lanier Dunn

City Manager

City of Elberton, Georgia

Executed February 8th, 2011